

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

TYRONE KEYS)
Plaintiff,)
v.) Case No. 8:18-cv-02098-CEH-JSS
BERT BELL/PETE ROZELLE NFL)
PLAYER RETIREMENT PLAN and the)
NFL PLAYER DISABILITY &)
NEUROCOGNITIVE BENEFIT PLAN)
Defendants.)

)

**DECLARATION OF MICHAEL L. JUNK IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFF'S MOTION FOR PROTECTIVE ORDER**

I, MICHAEL L. JUNK, declare the following:

1. I am over the age of 18, and I am otherwise fully competent to testify to the matters stated in this Declaration.

2. I am Of Counsel at Groom Law Group, Chartered, in Washington, DC. I represent the Bert Bell/Pete Rozelle NFL Player Retirement Plan and the NFL Player Disability & Neurocognitive Benefit Plan.

3. I make this Declaration in support of the Plans' Opposition to Plaintiff's Motion for Protective Order Regarding Defendants' Subpoenas for Plaintiff's Bank Records (ECF 44).

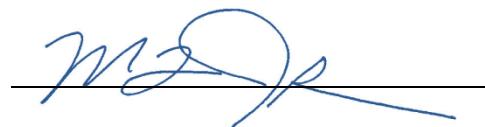
4. Attached as Exhibit A is a true and correct copy of a letter from Michael Junk to Jeff Dahl and Lansing Scriven dated August 2, 2019.

5. Attached as Exhibit B are a true and correct copies of the subpoenas to Suncoast Credit Union and Synchrony served by the Plans on August 5, 2019.

6. Attached as Exhibit C is a true and correct copy of the final decision letter relating to Tyrone Keys' appeal from the Retirement Board's August 16, 2017 decision reclassifying and terminating his disability benefits.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 29, 2019



Michael L. Junk